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MEMBER: N.Y. & N.J. BAR

Via ECF & Email
February 18, 2025

BY ECF AND E-MAIL

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED, pg. 2.

Re: *United States v. Jose Cesari, 24 Cr. 154-1 (ER)*

Dear Judge Ramos:

I write to request a temporary amendment to Mr. Cesari's conditions of bond to allow him to attend a one-time event on March 1, 2025, from the hours of 8 pm to 11pm, a celebration of the anticipated birth of his girlfriend and his child and at which party the sex of the unborn child will be revealed to the family. This is Mr. Cesari's first child and he is extremely excited. Attending the party is very important to Mr. Cesari. This is also his first request for a temporary amendment to his bond to attend a social event.

Mr. Cesari is released on a \$100,000 bond secured by the signature of four suretors, with GPS monitoring/home detention. His pretrial officer, Francesca Piperato reports that Mr. Cesari is compliant with his conditions of bond, including attending all GED classes and his mental health treatment sessions.

The celebration party is scheduled for March 1st at 1670 Southern Blvd. in the Bronx. This is his girlfriend's family apartment which is about a 15-minute walk from his home. He will be attending with his entire family, including his sister and grandmother, both are suretors on his bond. Her relatives will likewise be attending. The hours of the party are from 8-11. Notably, he is currently out of his home for work during these hours and has consistently complied with these hours and returned home as required.

Officer Piperato explained that she cannot consent to this request simply because it is her Office's policy not to consent to request to attend social events. Assistant United States Attorney Joseph H. Rosenberg informed that he likewise does not consent to this request but has provided no reason for declining to consent. He did state he would *not* be filing a letter in opposition.

Mr. Cesari has now made every effort to demonstrate he has changed both in his attitude and his behavior. He now has demonstrated that he can and will comply with Court orders. It is because this occasion means so much to Mr. Cesari and that he is making change that I urge this Court to grant him leave to be out of his residence on March 1 from 8-11-just three hours- to attend a party that celebrates his unborn child. I suggest the Court's granting of this request will do wonders for his mental health and encourage him to continue on the path he is currently on.

Respectfully submitted,

/s/

Donna R. Newman

Cc: USPTO Francesca Piperato

AUSA Joseph H. Rosenberg

AUSA Adam Margulies

Jose Cesari

Cesari's application for a temporary modification of his conditions of bond is granted.
SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: 2/24/2025

New York, New York